

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ALFONSO ESCALANTE ROJAS and
FLORENTINO BAUTISTA,
*on behalf of themselves, FLSA Collective Plaintiffs,
and the Class,*

Plaintiffs,

Case No.: 1: 22-cv-02083-RA

OFFER OF JUDGMENT

v.

PIZZA PETE'S LLC
d/b/a PIZZA PETE'S,
PFKM CO LLC
d/b/a BRAVO PIZZA,
12 APOSTLES LLC
d/b/a BRAVO PIZZA,
MFKA ENTERPRISES INC
d/b/a BRAVO PIZZA,
BEK 1 LLC
d/b/a BRAVO PIZZA,
HASHEM MELECH INC
d/b/a BRAVO PIZZA,
LFL ENTERPRISES INC
d/b/a BRAVO PIZZA,
ASFJ ENTERPRISES INC
d/b/a BRAVO KOSHER PIZZA,
18 PIZZA LLC
d/b/a BRAVO KOSHER PIZZA,
JASK ENTERPRISES INC.
d/b/a FRANKIE BOY'S PIZZA,
FRANK LIBRETTA, MICHAEL LIBRETTA,
TANIA FELLUS, and KENNETH FELLUS,
Defendants.

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendants PIZZA PETE'S LLC d/b/a PIZZA PETE'S, PFKM CO LLC d/b/a BRAVO PIZZA, 12 APOSTLES LLC d/b/a BRAVO PIZZA, MFKA ENTERPRISES INC d/b/a BRAVO PIZZA, BEK 1 LLC d/b/a BRAVO PIZZA, HASHEM MELECH INC d/b/a BRAVO PIZZA, LFL ENTERPRISES INC d/b/a


BRAVO PIZZA, ASFJ ENTERPRISES INC d/b/a BRAVO KOSHER PIZZA, 18 PIZZA LLC d/b/a BRAVO KOSHER PIZZA, JASK ENTERPRISES INC. d/b/a FRANKIE BOY'S PIZZA, FRANK LIBRETTA, MICHAEL LIBRETTA, TANIA FELLUS, and KENNETH FELLUS (collectively, "Defendants") hereby offer to allow judgment to be taken against them, jointly and severally, and in favor of Plaintiff ALFONSO ESCALANTE ROJAS ("Plaintiff Rojas") and Plaintiff FLORENTINO BAUTISTA ("Plaintiff Bautista"), collectively ("Plaintiffs"), in the sum of Forty-Two Thousand Dollars and No Cents (\$42,000.00), inclusive of all of Plaintiffs' claims for relief and damages, attorneys' fees, costs and expenses.

This Offer of Judgment is made for the purposes specified in Federal Rule of Civil Procedure 68, and neither this Offer of Judgment nor any judgment that may result from this Offer of Judgment shall be construed as either an admission of liability on the part of Defendants, or any of them, or that Plaintiffs have suffered any damages.

This Offer of Judgment is made pursuant to the provisions of Rule 68 of the Federal Rules of Civil Procedure, and shall be deemed withdrawn unless Plaintiff Rojas and Plaintiff Bautista serve written notice of their acceptance within fourteen (14) days of the date on which this Offer of Judgment was served. Any evidence of this Offer of Judgment shall be inadmissible except as provided in Rule 68 of the Federal Rules of Civil Procedure.

Dated: New York, New York
April 28, 2022

MANGO & IACOVIELLO, LLP



Anthony G. Mango, Esq.

Attorney for Defendants

14 Penn Plaza, Suite 1919

New York, New York 10122

(212) 695-5454

Email: amango@mandilaw.com